

Lon A. Jenkins (4060)
Tami Gadd (12517)
MaryAnn Bride (13146)
Katherine T. Kang (14457)
OFFICE OF THE CHAPTER 13 TRUSTEE
465 South 400 East, Suite 200
Salt Lake City, Utah 84111
Telephone: (801) 596-2884
Facsimile: (801) 596-2898
Email: utahtrusteemail@ch13ut.org

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

IN RE:

CASE: 22-23930

Bryan Larsen
Heather D Larsen

CHAPTER 13

Debtors

Hon. R. KIMBALL MOSIER

TRUSTEE'S CONTINUING OBJECTION TO CONFIRMATION

The Standing Chapter 13 Trustee, hereby objects to confirmation based on the following unresolved issues:

Restatement of Issues from Prior Objection(s):

1. The Trustee projects that the Debtor(s) direct payment(s) to satisfy a retirement loan(s), will end within 60-months. The Debtor(s) should provide the Trustee with evidence as to the loan balance(s) as of the petition date. See In re Kofford, Slip Copy, 2012 WL 6042861 (Bankr. D. Utah Dec. 4, 2012) (Thurman).
2. Schedule D does not list every creditor that holds a secured claim: US Department of HUD, and Les Schwab.

3. The Chapter 13 plan does not comply with §§ 1322(b) and 1325(a)(5) in that it does not provide for the following secured claims: US Department of HUD, Les Schwab, and Guild Mortgage Company.

4. The Debtor(s) failed to produce at the 341 Meeting statements from their Venmo account(s) for the period that covers the petition date (see Fed. R. Bankr. P. 4002(b)(2)(B)).

5. It appears that the Debtor(s)' Current Monthly Income (as that term is defined by § 101(10A)) is greater than what is disclosed on Form 22C. The Trustee requests the Debtor(s) provide the book end pay advices or evidence of income used to calculate the Form 22C.

THEREFORE, the Trustee has an ongoing objection to the confirmation.

Dated: November 22, 2022

LAJ /S/
LON A. JENKINS
CHAPTER 13 TRUSTEE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Continuing Objection to Confirmation was served upon all persons entitled to receive notice in this case via ECF Notification or by U.S. Mail to the following parties on November 22, 2022:

E. KENT WINWARD, ECF Notification

/s/ Rachel Rees